

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CLERK OF COURT

KENNETH JONES

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

MEMPHIS CITY SCHOOLS

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, KENNETH JONES
(name of plaintiff)

is a citizen of the United States and resides at 123 ARMOUR PL
(street address)

Byhalia USA MS
(city) (country) (state)

38611 662-701-5492 / 662-544-6170
(zip code) (telephone number)

3. Defendant Memphis City Schools

(defendant's name)
lives at, or its business is located at 2599 AVERY AVENUE, Rm 138
(street address)
Memphis TN 38112

4. Plaintiff sought employment from the defendant or was employed by the defendant at

2597 AVERY AVENUE, (MEMPHIS, TN 38112)
(street address)
Memphis USA TN 38112
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 5 SEPTEMBER 2007

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 14 MAY 2012. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ____ race, (2) ____ color, (3) X sex, (4) ____ religion, (5) ____ national origin, defendant

(a) X failed to employ plaintiff.

(b) ____ terminated plaintiff's employment.

(c) ____ failed to promote plaintiff.

(d) ____

10. The circumstances under which defendant discriminated against plaintiff were as follows:

ON SEPTEMBER 2007, I WAS HIRED AS A SUBSTITUTE (TE) TEACHER. I SHOULD HAVE BEEN HIRED AS A FULL TIME TEACHER BECAUSE I HAD FULL TEACHER CERTIFICATION BY THE STATE OF TENNESSEE IN BUSINESS EDUCATION (2007). I NOTICE YOUNGER TEACHERS WERE HIRED WITH INCOMPLETE TEACHER CERTIFICATION OR NONE AT ALL. I DID ASK ON MORE THAN ONE EVENT FOR A FULL TIME TEACHING POSITION. I WAS GIVEN THE RUN AROUND, I HAD TO FILL A NEW APPLICATION, WHICH UNNECESSARY BECAUSE I WOULD BE PUTTING THE SAME INFORMATION THE APPLICATION.

11. The acts set forth in paragraph 9 of this complaint

- (a) ~~are~~ are still being committed by defendant.
 (b) _____ are no longer being committed by defendant.
 (c) X may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, or
 (b) _____ Defendant be directed to re-employ plaintiff, or
 (c) _____ Defendant be directed to promote plaintiff, or;
 (d) _____ Defendant be directed to _____

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (X) No ()

Denise Jones 8/13/2012
 SIGNATURE OF PLAINTIFF